

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ROBERT SHEREZ,

Plaintiff,

vs.

STATE OF HAWAII DEPARTMENT
OF EDUCATION; PATRICIA
HAMAMOTO, Superintendent of
Hawaii Schools, MEREDETH
MAEDA, Principal, Castle High
School; SARA GRONNER OR
GRONNA, Vice Principal of Castle
High School,

Defendants.

CIVIL NO. 04-00390 JMS-KSC

DECLARATION OF
BEVERLY REIDY

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I, BEVERLY REIDY, declare as follows:

1. I am presently employed by the Department of Education as an educational specialist assigned to the Windward Oahu District Office. I have been in this position since August 2002, and a district educational specialist since August 2000. My duties include the administration of all special education/special services programs and services for Kailua/Kalaheo Complexes, in conformance with current federal and Department of Education rules, policies, regulations and program guidelines. This includes, but is not limited to, plans and projections

relating to staffing, budget, program establishment and program emphasis, directing the diagnostic, identification, certification of pupil personnel services and administrative program support for the complex area superintendent and district resource staff and direct service providers.

2. Mr. Martin Mattison also served as an educational specialist assigned to the Windward Oahu District Office. He was assigned similar duties for the Castle/Kahuku Complexes. In April 2006, Mr. Mattison passed away. Since that time, I have temporarily assumed the duties discharged by the late Mr. Mattison.

3. As an educational specialist, one of the programs I supervise is the Home-Hospital Instructional Services program. This program provides instruction to students, in the Windward Oahu District, who were not able to attend school because of medical reasons. Furthermore, as an educational specialist who has oversight of this program, I am familiar with all policies and records relevant to this program.

4. Since August of 2002, this program has maintained a pool of teachers willing to serve as tutors. The vast majority of the teachers in this pool are female. However, there are a small number of male teachers willing to serve as tutors.

5. In every school year since August of 2002, this program had assigned at least one male teacher to serve as a tutor to a female student.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawai'i, January 31, 2007.

Beverly S. Reidy
BEVERLY REIDY